

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BUTCHIE LONG,	:	
Petitioner,	:	Civil Action
v.	:	NO. 19-3192
THOMAS MCGINLEY,	:	
<i>et al.,</i>	:	
Respondents.	:	

UNOPPOSED MOTION FOR EXTENSION OF TIME

1. Petitioner Butchie Long is a Pennsylvania state prisoner serving a mandatory term of life imprisonment for first-degree murder and related firearm charges.
2. On July 22, 2019, Long filed a *pro se* petition for a writ of habeas corpus pursuant to 28 U.S.C. § 2254 with the Court. ECF 1.
3. This Court stayed Long's case until March 8, 2021, while Long exhausted claims in state court proceedings. ECF 22, 23.
4. Respondents eventually agreed with Long that an evidentiary hearing was warranted (ECF 38) and that hearing was held on March 8, 2023. ECF 46.
5. Long filed a post-hearing brief on June 27, 2023. ECF 54.
6. Before Respondents filed a response, Long filed an unopposed amended petition on November 28, 2023. ECF 62.

7. Undersigned counsel was assigned the case on July 22, 2024, after prior counsel moved to a different unit within the District Attorney's Office. ECF 70.
8. Long filed a second unopposed amended petition on October 21, 2024, raising additional claims based on newly discovered evidence. ECF 73.
9. Most recently, this Court ordered Respondents to respond by March 21, 2025. ECF 77.
10. Unfortunately, Respondents were also unable to comply with that deadline. The undersigned is continuing to draft a response for this Court, as well as attending to Petitioner's related state court action.
11. Respondents therefore request a 90-day extension of time in which to file a response to Long's petitions.
12. Respondents have conferred with opposing counsel regarding this motion and they do not oppose the request.

WHEREFORE, Respondents request that they be granted an extension of 90 days, until June 19, 2025, to file the ordered response to Long's pending petitions.

Respectfully submitted,

/s/ Mackenzie D. Hayes

MACKENZIE D. HAYES
Assistant District Attorney

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion was served on March 21, 2025, to counsel for Petitioner, Karl D. Schwartz and Nilam A. Sanghvi, via this Court's CM/ECF electronic filing system.

/s/ Mackenzie D. Hayes
Mackenzie D. Hayes, Esq.
Assistant District Attorney
Federal Litigation Unit